



August 1, 2011

Julius Genachowski
Chairman
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

**Re: Comments: FCC File No. SAT-MOD-20101118-00239--*LightSquared*
*Application for Modification***

Dear Mr. Chairman:

Background. On June 15, 2011, a number of technology and venture capital firms wrote to you regarding the above-referenced matter, encouraging the FCC to develop an environment where LightSquared and GPS can co-exist and noting that such an outcome was consistent with the charter of the FCC.

The filing also observed that wireless services have become an invaluable engine for productivity and innovation in the U.S. economy, and they play a critical role in the U.S. retaining its lead in global competitiveness. In our view, the importance of building the world's first nationwide end-to-end, all IP wireless network and taking the global lead in LTE deployment cannot be overstated. Once complete, we believe the LightSquared network will increase the nation's broadband capacity, enhancing wireless competition and providing additional choice in the wireless industry. In addition, we believe LightSquared (a) is poised to deliver unique capabilities to support public safety, (b) is committed to bringing broadband to rural communities, (c) has a collaborative open-platform design that, when combined with its 100% wholesale business model, could spawn innovation by supporting new entrants and leading edge applications, and (d) is enabling an ecosystem of third party software, hardware, and applications providers who desire collectively to transform not only the wireless industry, but also other industries such as health care, automotive, transportation, education, media, entertainment, and energy, based on the communication services LTE will enable. With the first LTE network completion, the U.S. will continue to lead innovation.

LightSquared's Proposal. On June 30, in an effort to construct a win-win solution, LightSquared proposed operating on the lower 10 MHz of its authorized L-band frequencies – the frequencies furthest away from the GPS frequencies - leaving a buffer or guard band of 23 MHz between itself and the closest GPS frequency. It is our understanding that the GPS Industry Council made a similar proposal when it first identified the potential for interference. Although we cannot comment on the viability of this proposal, it is our understanding test results show that over 99.5% of existing GPS devices would not be affected if LightSquared were to operate on the lower 10 MHz, and LightSquared has committed to addressing those small number of receivers still impacted.

If LightSquared's agreement to use less than its authorized spectrum is a viable option, and it helps to develop a new, nationwide 4G-LTE network, complemented with satellite coverage, then broadband access nationwide will be significantly increased, while mitigating the risk of GPS interference. We also understand that GPS device manufacturers can support this proposal by developing receivers that reasonably discriminate against reception of signals outside their allocated spectrum. We believe these efforts by both LightSquared and the GPS manufactures collectively create a win-win proposal for wireless subscribers in the US.

Conclusion. Securing *both* GPS and nationwide wireless broadband should be and can be the goal. We recommend that the FCC closely evaluate the LightSquared proposal, and if technically viable, adopt the solution.

Sincerely,



James A. Tholen
Chief Financial Officer

CC: Commissioner Mignon Clyburn
Commissioner Michael Copps
Commissioner Robert McDowell